**Agency and the Basing Relation**

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Abstract: If agency is understood as the capacity to respond to our reasons, then agency is exercised not merely in our intentional actions, but also in our desires, resentments, beliefs, and credal states. But if agency is understood as the capacity to *act* in light of our reasons, can it still include all these states among its exercises? Kieran Setiya has recently argued that it cannot. Our doxastic responsiveness to our reasons, he argues, involves nothing more than the conjunction of our doxastic responses, on the one hand, and our beliefs about those reasons, on the other. Thus, he concludes, doxastic responsiveness does not involve an exercise of agency, because it does not involve *causing* anything. The present paper rebuts Setiya’s argument for this conclusion, and argues that the very same kind of agency that we find in intentional action can also be found in beliefs and other attitudes.

1. **Introduction**

If I offer you enough money to believe that Trump is a great president, you might try to do various things to get yourself to hold that belief. But even if you succeed, you will not thereby have voluntarily believed that Trump is a great president: you will only have voluntarily *gotten yourself* to believe it. To believe is not to choose, even if some beliefs foreseeably result from choices.[[1]](#footnote-1) Given that belief is not choice, how are we to understand the way in which we are responsible, or answerable, for our beliefs? How are we to understand the kind of agency that we exercise in belief?

The question is not new, and many different answers have been proposed. According to some philosophers, we are responsible for our beliefs in the same way that we are responsible for our front yard: it is our responsibility to see to their proper maintenance.[[2]](#footnote-2) According to other philosophers, we are responsible for our beliefs in the same way that we are responsible for our plans: we exercise our will in forming and sustaining them.[[3]](#footnote-3) And according to still other philosophers, we are responsible for our beliefs in the same way that we are responsible for our reactive attitudes: we are responsible for accepting the evaluations expressed by them.[[4]](#footnote-4) But though philosophers have offered many different answers to the aforestated question, few have challenged the question as resting on a false presupposition.

Kieran Setiya has issued just such a challenge. According to Setiya, the kind of agency that we exercise in belief consists of *nothing more substantial* than the fact that we not only hold beliefs, but we also hold beliefs about the reasons we have to hold those very beliefs. To believe a proposition P on the basis of a reason R is merely to believe a conjunction of the form *P, and the fact that R is a good reason for P*. There is nothing more to epistemic agency than that. In particular, epistemic agency differs from practical agency in that the former does not involve *causing* anything.

The present paper offers a response to Setiya’s argument. I formulate those arguments in section II, show that they are invalid in section III, challenge their crucial premise in section IV, and finally argue that Setiya’s appeal to the metaphysical distinction between the static and the dynamic cannot do the work he wants it to do.

1. **Setiya’s argument for deflationism about epistemic agency**

Setiya’s argument is an inference to the best explanation. It begins by noting three features of belief, and then proposes an explanation of those three features.

First: “suppose I am prone to wishful thinking, and I would continue to believe that I will win the lottery even if I had no evidence. As it happens, I know that the lottery is rigged in my favour and regard this as proof that I will win. Although the belief that I will win is not sustained by my belief that the lottery is rigged and is counterfactually independent of it, that does not prevent me from believing that I will win on the ground that the lottery is rigged, or from having a justified belief that I will win. Asked ‘why do you believe that you will win the lottery?’ I can cite conclusive proof. What more could knowledge demand?”[[5]](#footnote-5) Setiya generalizes this point from cases in which we recognize ourselves to possess conclusive evidence to cases in which we take ourselves to possess less than conclusive evidence. In short, Setiya says, believing for a reason doesn’t require that our belief be causally sustained by, or counterfactually sensitive to, our having that reason: merely recognizing the reason for our belief *as such* suffices for it to be a reason for which we believe.

Second, “it is incoherent to assert ‘p and the fact that q is evidence that p, but I don’t believe that p even partly because I believe that q.’ … the paradox rests on the fact that being in a position to assert the first claim entails the falsehood of the second. One cannot believe that p, and that the fact that q is evidence p, without believing that p because one believes that q, in the epistemic sense. … For instance, I believe that I was born in Hull and that the fact that my passport says so is evidence for this claim. Do I believe that I was born in Hull because I know that my passport says so? In some sense of ‘because,’ surely not. I did not form this belief by looking at my passport, nor would I revise it if I discovered that my passport says something else. What my passport says is not the first or most important evidence of my place of birth, and it would be pragmatically odd to cite it as the ground of my belief. … Still, once we acknowledge these facts, there is no reason to deny that the words in my passport are among the grounds on which I believe that I was born in Hull.”[[6]](#footnote-6)

Third, our knowledge of our own reasons for belief is privileged in the same way that our knowledge of our own beliefs is privileged. “If you believe that *p*, you are in a position to know that you believe that *p*. Likewise, if you believe that *p* on the ground that *q*, you are in a position to know that you believe that *p* and that the fact that *q* is evidence that *p*. But to believe that *p* because one believes that *q* just is to believe that *p* and that the fact that *q* is evidence that *p*. So you are in a position to know that you believe that *p* because you believe that *q*. At the same time, the reductive theory explains how your answer to the question ‘Why?’ plays a constitutive role in believing for a reason. When you believe that *p*, it follows from your beliefs about the evidence that *p* that you believe it on the corresponding grounds. What accounts for these phenomena if believing for a reason is not a mere conjunction of beliefs?”

These three facts – the fact that I can believe on grounds to which my belief is not sensitive, that I cannot coherently assert that I have good evidence that p even though it is not my grounds for believing that p, and that I have privileged knowledge of my own reasons for belief – are all straightforwardly explained, Setiya claims, by the following simple account of the epistemic basing relation, which I will henceforth call “Basing as Believing a Conjunction”, or BBC:

(BBC) To believe that p on the ground that q is to believe that p and that the fact that q is evidence that p.[[7]](#footnote-7)

But if BBC is true, then there are two very basic differences between practical agency and so-called “epistemic agency”. First, practical agency involves a causal relation between one’s motives or intentions, on the one hand, and one’s intentional action, on the other – but no such causal relation is necessary for epistemic agency, since the latter sort of agency involves nothing more than believing certain conjunctions of the form *P, and the fact that Q is evidence that P*. And second, though it may be typically true that we act for reasons that we take to be good reasons for so acting, our taking them to be good reasons for so acting is not merely insufficient, but also unnecessary, for our acting for those reasons. I can be perfectly well aware of why I performed some action (e.g. doing something deliberately to annoy my partner when I find myself annoyed by something she does), even while recognizing that my reason was not a good reason for so acting. Thus, believing a conjunction about our reasons is neither necessary nor sufficient for practical agency, which involves causation, but it is both necessary and sufficient for epistemic agency, which doesn’t involve causation. In this sense, Setiya claims to defend a kind of “deflationism” about epistemic agency:

(Deflationism) Epistemic agency does not involve our exercise of a capacity to cause anything – it involves nothing over and above our having certain kinds of belief.

This completes Setiya’s argument for Deflationism about epistemic agency. In the remainder of this paper, I will attempt to undermine both his argument from BBC to Deflationism, and also his argument for BBC.

1. **Setiya’s inference from BBC to Deflationism, rebutted**

Let’s grant, for the sake of argument, that BBC is true. Does Deflationism follow? In this section, I argue that it does not.

The inference from BBC to Deflationism may seem plausible. After all, BBC is an identity statement. It says that believing p on the grounds that q *is identical to* believing the conjunction: p, and the fact that q is evidence that p. If this identity statement is true, then it follows that epistemic agency *involves nothing over and above* our having certain kinds of belief (viz., beliefs in conjunction of the form just mentioned). And isn’t this just to say that Deflationism is true?

No. Deflationism says *not only* that epistemic agency involves nothing over and above our having certain kinds of belief. Deflationism also says that epistemic agency *does not* involve the exercise of a capacity to cause anything. But this further claim about what epistemic agency does not involve doesn’t follow from the claim that epistemic agency involves nothing over and above our having certain kinds of belief. For Deflationism is consistent with the claim that our having the relevant kinds of belief involves the exercise of a capacity to cause certain kinds of things. And Setiya says nothing to rule out that latter claim. For all that Setiya argues, our believing conjunctions of the form *p, and the fact that q is evidence that p* involves the exercise of our capacity to cause certain kinds of things to happen.

It is plausible that many of our beliefs are beliefs that we can have only if we exercise our capacity to cause, or to be affected by, certain kinds of thing. When playing tennis, I might believe that *this* is my most effective underhand return: my having a belief of this kind is possible only if I exercise one of my athletic capacities while having the belief. In the absence of such an exercise, there is nothing for the demonstrative element in my belief to pick out, and so there are no truth-conditions that I believe to obtain. When trying to decide which color to paint my walls, I might believe that *this* shade of blue is more appealing than *that* one: my having a belief of this kind is possible only if I exercise some of my perceptual capacities while having the belief. In the absence of such an exercise, there is nothing for the demonstrative elements in my belief to pick out, and so there are no truth-conditions that I believe to obtain. In such cases, it’s a condition of the possibility of my holding a certain kind of belief that I exercise a capacity to cause certain things to occur, or to be affected by certain perceptible objects.

The cases above involve demonstrative reference, and so each such belief involves the exercise of a particular practical or perceptual capacity for such reference. But even some beliefs that do not involve demonstrative reference might nonetheless be such that our having them involves our exercise of a capacity to cause certain kinds of things. Obvious cases of this sort are our beliefs concerning which games are most challenging to play, or which foods are most enjoyable to eat. Even when such beliefs involve no demonstrative reference, our having them requires our use of the relevant concepts, which in turn requires our exercise of our imaginative, practical, and perceptual capacities.

Finally, consider our beliefs concerning which things are *right* or *wrong*, *better* or *worse*, *appropriate* or *inappropriate*, and so on. We can employ those evaluative concepts only if, and only because, those concepts can play some role in our lives. Concepts that can play no such role – e.g., such concepts as (for me at least) *witch*, *upstart*, *vermin, divine* – are concepts that can be *mentioned* in our beliefs, but not used in them. In other words, we can attribute beliefs involving such concepts to others whom we understand only incompletely, but we cannot form beliefs involving such concepts ourselves. Clearly, the same is true of the concept *having* *evidence*: this is a concept that we can use only because the concept can play some role in our lives. And, as I have argued elsewhere[[8]](#footnote-8), that concept does play a role in our lives, guiding our beliefs and our credal states, as well as guiding our responses to the beliefs and credal states of others. But the concept can play such a role only if, and only because, we exercise a capacity to adjust our beliefs and credal states in response to the evidence we have, and we exercise a capacity to evaluate the beliefs and credal states of others by appeal to the evidence they have. Had we no such capacity – were we in no better position to adjust our beliefs to the evidence we have than we are, say, to adjust our beliefs to the number of neutrons in the nearest galaxy – we would not possess, and could not use, the concept *evidence*; we could, at best, describe agents who do use such a concept.

In sum, it is a condition of the possibility of our having beliefs about our evidence as such that we have the concept *evidence*, and having that concept requires us to have the capacity to adjust our beliefs and credal states to our evidence. The latter capacity is a capacity to cause various changes in our overall mental state to occur. Thus, forming beliefs about evidence requires a capacity to cause various changes to occur. Even if BBC is true, Deflationism doesn’t follow from it, and is anyway plausibly false. In the next section, however, I will argue that BBC is not even true.

1. **Setiya’s argument for BBC, rebutted**

In the preceding section, I granted for the sake of argument that BBC is true, and then I showed that Deflationism doesn’t follow. In the present section, I argue that Setiya’s argument for BBC fails: even if we grant that the three explananda that BBC is supposed to explain are all true, BBC still is not the best explanation of them.

Let’s recall the explananda:

1. Q can be a reason for which we believe that P even if our belief that P is not counterfactually sensitive to Q.
2. It is incoherent to assert something of the form ‘p and the fact that q is evidence that p, but I don’t believe that p even partly because I believe that q’.
3. Our knowledge of our own reasons for belief is privileged in the same way that our knowledge of our own beliefs is privileged.

Some philosophers would challenge one or more of these explananda, but I won’t do so here – not because I take them to be obviously true (indeed, I take (b) to be not quite true), but rather because their truth won’t matter for the challenge I issue here. My challenge to Setiya’s argument for BBC is that, even if (a) – (c) were true, there is still a better explanation of them than BBC.

To see what this explanation could be, let’s start by noticing that (c) is an insufficiently general statement concerning our privileged access. For if we have privileged access to our own reasons for belief, then we also have the same sort of privileged access to our own reasons for action. My ability to say why I believe, e.g., that I was born in Holon is no different in kind than my ability to say why I decided not to return to Israel. Of course, I am not infallible with respect to either question, but first-person privilege does not entail infallibility. Whatever my first-person privilege consists in with respect to the question of what I believe and why I believe it, it consists in precisely the same thing with respect to the question of what I intend and why I intend it, or the question of what I am doing and why I am doing it. And BBC doesn’t begin to explain my first-person privilege with respect to these questions about my intentions or my intentional actions.

What could explain such first-person privilege is that all of the answers to all of these questions *consist in* representations that I have, and to which I have privileged access. Not only do my beliefs and intentions consist at least partly in such representations, but also my holding these beliefs or intentions for reasons consist in such representations, and even my performing certain intentional actions for reasons consist in such representations. This may at first seem like a bizarre suggestion: how could my performing certain intentional actions for certain reasons *consist in* my representing something? What kind of representation could it consist in?

To see how the performance of an intentional action for a reason could consist in my representing something, let’s consider an example. I’m looking at a blueprint of a house that has not yet been built, and I’m performing various intentional actions (e.g., putting bricks in various places) in order to create something depicted by the blueprint. In such a case, I’m performing various intentional actions, but what unites all these various actions into a single process of building a house is that they are all done as part of my effort to implement the blueprint. The blueprint is a representation of what I’m trying to create, and my various intentional actions add up to the act of building a house by virtue of the fact that they are all performed in an effort to make it the case that the representation is accurate. The blueprint is thus what unifies my various actions into a single intentional action of building a house.

The example I’ve given is one in which an agential performance has the form (or the particular kind of unity) it has by virtue of that performance being guided by my representation of that very form. But I propose that what goes for the agential performance in this case also goes for any agential performance done for any reason: to think or do or feel anything for a reason is for the reason to guide one’s thinking or doing or feeling, and to guide it by virtue of the agent’s representing this guidance as justifying the thought or deed or feeling at issue.

This representation is similar to, but also different in several ways from, the representation involved in what Boghossian calls the “taking condition” on inference. The taking condition involves the agent representing a particular reason as a good reason for a particular kind of response, whether or not the agent issues that response, and whether or not she issues that response for that reason. But the kind of representation I’m describing here involves a case of token-reflexive reference to a particular guidance relation between R, on the one hand, and the agent’s response to R, on the other, and it refers to that guidance relation under the guise of *justifying the agent’s response*. So the kind of representation I’m describing here is a representation that an agent cannot have unless the guidance relation to which the representation token-reflexively refers is actual. Without the obtaining of that guidance relation between R and the agent’s response, the representation in question cannot so much as exist – never mind its accuracy. Thus, a necessary condition of the agent’s having the relevant representation is that she has the reason R, she has the attitude or performs the action that is responsive to R, and these two things are explanatorily related in a way to which the agent can refer. Only if all of these necessary conditions obtain can the agent form the representation that constitutes the agent’s believing or intending or doing something *for the reason R*.

How can an agent’s believing or intending or intentionally doing something for a reason R *consist in* her having this representation? The blueprint example above is intended to provide an illustration of how this is possible, but perhaps another illustration will be helpful here. Consider the various explanatory relations that can obtain between someone’s committing a crime and their conviction on the charge of committing that crime. Of course there may be many different explanatory relations running between an agent’s committing a crime, on the one hand, and their conviction on the charge of committing that crime, on the other. But a particular one of these explanatory relations is constituted by the fact that conviction itself is a conviction *for committing that very crime*. The conviction represents itself as appropriately responsive to the agent’s commission of that crime, and by so representing itself, it unifies a sundry collection of processes, states, and events as together constituting the explanatory relation between the agent’s crime, on the one hand, and the conviction, on the other. It is by virtue of the conviction’s so representing itself in this way that it counts as a conviction for committing that crime. The representation unifies a bunch of processes, states, and events into a single explanatory relation – the relation in virtue of which the conviction is *for that crime*.

More generally, the guidance relation between R, on the one hand, and the agent’s response to R, on the other, is an explanatory relation that is *individuated by* the agent’s representation of that relation – and in particular, it can be individuated by the agent’s representation of that relation as involving the agent’s appropriate responsiveness to R. There may be lots of different explanatory relations running between R, on the one hand, and the agent’s response, on the other, but the explanatory relation that is identical to the agent’s basing her response on R – i.e., having that response for the reason that R – is the explanatory relation that is individuated by the agent’s representing her response *as* an appropriate response to R. Since the explanatory relation is individuated by that representation, the agent will have the same privileged access to the explanatory relation as she has to the representation that individuates it.

Now that we’ve proposed an explanation of (c) that generalizes to intentions and intentional actions, notice that this same explanation can also explain (a) and (b). It can explain (a) because the explanatory relation between R and the agent’s response to R may overdetermine the agent’s response. And explanatorily overdetermined phenomena are typically not counterfactually sensitive to any particular one of their explainers: the same point is true of intentions as well as belief. And it can explain (b) because, when the agent asserts something of the form ‘p and the fact that q is evidence that p, but I don’t believe that p even partly because I believe that q’, the first two conjuncts of her assertion represent her own belief that p as appropriately responsive to her evidence q. But her representation of that belief as an appropriate response to her evidence can unify an otherwise sundry collection of processes, states and events causally connecting her evidence q and her belief that p, and unify these various things under the category of her having that belief *on the basis of*, and so because of, q: again, the same point is true of intentions as well as beliefs. Of course, her representation can unify these various things in this way only if these things exist, i.e., only if there actually are some processes, events, and states causally connecting her evidence q and her belief that p: but she could assert the first two conjuncts in a single assertion only if there are at least some such processes, events, and states.

Thus, the present explanation of the generalized version of (c) also explains (a) and (b), whereas BBC cannot even begin to explain the generalized version of (c). I take this to show that BBC is not the best explanation of (a) – (c): a still better explanation is that the basing relation always consists in the agent’s token-reflexive representation of a particular response of hers as an appropriate response to some reason.[[9]](#footnote-9) I conclude that, even if we grant Setiya that (a) – (c) are all true, his argument for BBC still fails.

Nonetheless, putting aside the defects of Setiya’s argument for Deflationism, there may nonetheless seem to be something plausible about Deflationism. Part of the plausibility that Setiya lends to Deflationism comes from the fact that there is a metaphysical contrast between belief, on the one hand, and certain kinds of intentional action, on the other. Setiya tries to make out this contrast in terms of aspect. In the next section, I say why the metaphysical distinction marked by aspect doesn’t do the work that Setiya takes it to do.

1. **The Metaphysics of Agency**

Setiya distinguishes conditions as either static or dynamic. Dynamic conditions are those expressed by verbs that admit of a distinction between progressive and perfective aspect, and static conditions are those expressed by verbs that do not admit of such a distinction. The progressive aspect indicates that something is in progress but not yet complete, whereas the perfective aspect indicates that it is complete: thus, “he was walking” is progressive, whereas “he walked” is perfective. The example just given shows that “walking” is a verb that expresses a dynamic condition. In contrast, “believes” and “owns” are verbs that express static conditions, since there is no progressive form of either.

In Setiya’s terminology then, believing is a static condition, while walking is a dynamic condition. This is not controversial. But what is controversial is the idea that Setiya finds to be suggested by means of these labels – the idea that dynamic and static conditions differ with respect to the kind of agency they involve.[[10]](#footnote-10) We can begin to weaken the force of this suggestion if we notice that, by Setiya’s own definition, intending, desiring and resenting (all conditions involved in motivating our exercises of practical agency) are every bit as static as believing, while tripping, aging, and dying (all conditions that can befall us as organisms, and not in our capacity as practical agents) are every bit as dynamic as walking. The distinction between static and dynamic conditions seems to crosscut the distinction between those conditions involved in our practical agency, and those conditions not so involved.

In that case, how should we understand the distinction between the conditions that are involved in our practical agency and conditions that are not so involved? To answer this question, I need to make two preliminary distinctions. First, there is what I will call the distinction between disposition-exercises and other properties. Some properties of an object, e.g., its height or location, are not exercises of any disposition the thing has, whereas other properties, e.g., its dissolving in water on a particular occasion, or its moving towards the magnet on a particular occasion, are. Now, within the category of disposition-exercises, we can distinguish a subcategory of capacity-exercises: there are exercises of a special kind of disposition, a disposition to achieve some aim or objective. A metallic object may exercise its disposition to move towards a magnet on a particular occasion, but it doesn’t do so in order to achieve any aim or objective. But an object exercises a capacity only when it exercises a disposition *to achieve some aim, or objective*. And, of course, an object may, on some occasion, exercise a capacity to achieve some aim, even if it fails to achieve that aim. Indeed, our explanatory appeal to capacities is useful precisely because it helps us to understand what’s in common to capacity-exercises that are successful in achieving their aim and capacity-exercises that are unsuccessful in achieving their aim.

Agency, most broadly conceived, consists in the exercises of a creature’s capacities. On this broad conception, even plants and microorganisms have a kind of agency – we may call it “nutritive” agency, since their capacities have the aim of nourishing the possessor of the exercised capacity. Animals have a more specific kind of agency – we may call it “appetitive” agency, since their capacities have the aim of getting the animal to move around in order to satisfy its appetities. And humans have a still more specific kind of agency – we may call it “rational” agency, since their capacities have the aim of enabling the human to form a coherent picture of itself and its relation to the world, and strive to live in accordance with that picture.

1. **Conclusion: Agency as the Exercise of an Organism’s Capacity to Achieve its Objective**

Belief is a state, not an act. But agency, at least as it’s been most commonly understood, consists in the exercise of certain sorts of capacities, and not all exercises of those capacities are acts. Indeed, many of them – including not just our beliefs, but also our intentions, our reactive attitudes, our skills, and our evaluations – are states. What distinguishes those states from the many other states we can occupy independently of our agency is that the former are simply the exercises of agentive capacities whereas the latter are not. The metaphysical distinction between states and acts does not mark a distinction between two kinds of agency.

**Works Cited**

Boghossian, P. 2009. Epistemic Rules. *Journal of Philosophy* **105**: 472–500.

Boghossian, P. 2013. What is Inference? *Philosophical Studies* **169**: 1 – 18.

Boyle, M. 2011a. Active Belief. In D. Hunter, ed., *Belief and Agency*. Calgary: University of Calgary Press, 2011: 119–147.

Boyle, M. 2011b. ‘Making up Your Mind’ and the Activity of Reason. *Philosophers’ Imprint* 11: 1–24.

Chrisman, M. 2008. Ought to Believe. *Journal of Philosophy* **105**: 346 – 70.

Chrisman, M. 2012. The Normative Evaluation of Belief and the Aspectual Classificiation of Belief and Knowledge Attributions. *Journal of Philosophy* 2012 **109**: 588 – 612.

Hieronymi, P. 2006. Controlling Attitudes. *Pacific Philosophical Quarterly* 87: 45–74.

Hieronymi, P. 2009. Two Kinds of Agency. In L. O’Brien and M. Soteriou, eds., *Mental Actions*. Oxford: Oxford University Press, 2009: 138–162.

Hieronymi, P. 2011. Believing at Will. In D. Hunter, ed., *Belief and Agency*. Calgary: University of Calgary Press, 2011: 149–187.

Neta, R. 2008. What Evidence Do You Have? *British Journal for the Philosophy of Science* **59**: 89 – 119.

Neta, R. Forthcoming. The Basing Relation. Philosophical Review.

Peacocke, C. 1999. *Being Known*. Oxford: Oxford University Press.

Vendler, Z. 1957. Verbs and Times. *Philosophical Review* 56: 97–121.

Williams, B. 1970. Deciding to Believe. In *Problems of the Self*. Cambridge: Cambridge University Press, 1981: 136–151.

1. Williams 1970, Hieronymi 2011. [↑](#footnote-ref-1)
2. Chrisman 2008. [↑](#footnote-ref-2)
3. Peacocke 1999. [↑](#footnote-ref-3)
4. Hieronymi 2006. [↑](#footnote-ref-4)
5. Setiya 2013, 191. [↑](#footnote-ref-5)
6. Setiya 2013, 191 – 2. [↑](#footnote-ref-6)
7. BBC is one way of specifiying what is sometimes called a “Doxastic Theory of Basing”, but it is not the only way: doxastic theorists might take the epistemic basing relation not to involve belief in any particular conjunction, but rather some synchronic or diachronic pattern of beliefs. [↑](#footnote-ref-7)
8. Neta 2008. [↑](#footnote-ref-8)
9. I’ve argued in detail for this account of the basing relation in Neta forthcoming. [↑](#footnote-ref-9)
10. Chrisman 2012 defends this same controversial idea. [↑](#footnote-ref-10)